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ABSTRACT

This document provides a status report of the Michigan Department of Education's Civil Rights Compliance Program in the area of vocational education. The report is based on compliance audits of a minimum of 20 percent of the state's total number of secondary and postsecondary vocational education providers. Compliance activities were conducted by staff of the Office of Career and Technical Education Unit, the Community College Services Unit--Office of Higher Education Management, and IDEA Consultants, Inc. The report is presented in eight categories that summarize activities in each area: (1) compliance organization and staff; (2) state policy review; (3) review of state-operated institutions and programs; (4) subrecipients receiving agency desk audits; (5) identification of subrecipients for on-site reviews; (6) technical assistance activities; (7) subrecipients referred to the Office for Civil Rights; and (8) monitoring activities. All entities that were audited either had compliance plans in place or were willing to do so based on audit recommendations. (KC)

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CIVIL RIGHTS COMPLIANCE IN VOCATIONAL EDUCATION 1993-94 ANNUAL REPORT

Prepared for

Michigan State Board of Education

U.S. DEPARTMENT OF EDUCATION
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INTRODUCTION

The purpose of this document is to provide a status report of the Michigan Department of Education's Civil Rights Compliance Program mandated by *Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Handicap*, issued March 21, 1979. These *Guidelines*, which supplement Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973, authorize the Office of Career and Technical Education, under the State Board of Education, to adopt a compliance program to prevent, identify and remedy discrimination on the basis of race, color, national origin, sex and disability by its subrecipients.

In compliance with Section II(C) of the *Guidelines*, a *Methods of Administration* document, Michigan's plan for performing oversight responsibilities, was adopted by the Michigan State Board of Education and submitted to the U.S. Office of Education. The *Methods of Administration* was approved by the U.S. Office of Education and the U.S. Office for Civil Rights as a prerequisite for the approval of the 1981 State Plan for Vocational Education upon which Federal funding is based. The *Methods of Administration* was revised and adopted by the Michigan State Board of Education, then submitted to the U.S. Office of Education. No formal response has been received.

ADMINISTRATION OF THE CIVIL RIGHTS COMPLIANCE PROGRAM

The Office of Career and Technical Education as an administrative unit within the Michigan Department of Education, has prime responsibility for the Civil Rights Compliance Program for Vocational Education. The *Guidelines* and the subsequent memorandum, issued July 1979 by the Department of Health, Education, and Welfare, outlined procedures for preparing the *Methods of Administration* document, and dictated the content and standards for activities for this compliance program. Parts A 1-4 of Section II of the *Guidelines* require the state agency to conduct a review of its vocational education policies and programs to determine whether or not they are discriminatory.

The state agency must annually conduct an agency desk audit of a minimum of 20 percent of the state's total number of subrecipients (secondary and postsecondary fiscal agents that receive Federal financial assistance extended by the State Department and provide state approved vocational education programs). During a five-year cycle, all agencies are desk audited. On-site reviews of a minimum of 25 percent of the subrecipients desk audited must also be conducted annually to determine whether they engage in unlawful discrimination. Other obligations include the provision of technical assistance to aid recipients in identifying, preventing and remedying discrimination, and annually reporting compliance activities and findings to the Office for Civil Rights.

Compliance activities described in this report have been conducted by staff of the Office of Career and Technical Education Unit, the Community College Services Unit -- Office of Higher Education Management, and IDEA Consultants, Incorporated. Additional assistance, during the planning phase of this compliance program, was provided by the Michigan Civil Rights Commission, Michigan Rehabilitation Services, Special Education Services, and other agencies.

DESIGN OF THE REPORT

This report of the Civil Rights Compliance program for Vocational Education is presented in eight categories.

Those categories are:

I. Compliance Organization and Staff
II. State Policy Review
III. Review of State-Operated Institutions and Programs
IV. Subrecipients Receiving Agency Desk Audits
V. Identification of Subrecipients for On-Site Reviews
VI. Technical Assistance Activities
VII. Subrecipients Referred to the Office for Civil Rights
VIII. Monitoring Activities

This report is based on the state of Michigan's Civil Rights Compliance activities of the 1993-94 reporting year. The activities are in accordance with the Office for Civil Rights *Guidelines* and the State's *Methods of Administration* reporting requirements.

I. COMPLIANCE ORGANIZATION AND STAFF

The Office of Career and Technical Education (OCTE) staff are responsible for conducting the Civil Rights Compliance program. There have been a few changes with respect to the organization, staff, and the amount of time spent conducting these activities. One staff person of the Special Populations Programs and Services Unit of OCTE serves part-time as consultant for the *Methods of Administration* (MOA) compliance activities, and one secretary of OCTE works part-time with the project. In addition, approximately 15 OCTE staff persons assist part-time with the compliance program in conducting on-site reviews and providing technical assistance, if needed. The number of OCTE staff have decreased due to staff turnover and replacement factors.

IDEA Consultants, Incorporated (IDEA) participates in most MOA activities including desk audit data analysis and reporting, planning and conducting of on-site reviews, compliance plan development, and provision of technical assistance. IDEA's primary role is to obtain voluntary compliance plans and to monitor their implementation. IDEA assigned five employees to work on the MOA project: one project administrator, one project director, one project technical coordinator, one project technician, and one clerical support staff. These positions and the time allocated to their participation were as follows:

Position	Hours
Project Administrator	78
Project Director	1226
Project Technical Coordinator	1214
Project Technician	548
Clerical Support Staff	954
TOTAL STAFF HOURS	4020

II. STATE POLICY REVIEW

A. Purpose

The State-Level Policy and Program Review was designed and conducted to increase the impact of vocational education by ensuring that the policies and programs originating at the state level do not manifest or perpetuate discrimination. The review provides an opportunity to examine the basic regulations that establish and determine the course of vocational education in Michigan, and a sound basis upon which to make extensions, modifications, or deletions of these regulations.

B. Types of Policies Reviewed

"Section II(A) of the *Guidelines* prohibits State agency recipients from directly taking any action that leads to discrimination on the basis of race, color, national origin, sex and disability. The four general areas to which this prohibition applies are: 1) the establishment of criteria or formulas for distribution of Federal or State funds to vocational education programs; 2) the establishment of requirements for admission to or requirements for the administration of vocational education programs; 3)

the approval of action by local entities (subrecipients) providing vocational education; and 4) the conduct of their own programs." These four areas constitute the basis for the State Policy Review.

C. Methodology

A thorough review of state-level policies and programs has been reported each of the past twelve years, with the initial State-Level Policy and Program Review being conducted by the Office of Civil Rights--Methods Administration Task Force. This continuing review was conducted by the Department's OCR Consultant in cooperation with the OCTE supervisors. The review consisted of the following activities:

1. Analysis of the 1993-94 Michigan State Plan for Vocational Education.

2. Review of the 1993-94 *Planning Guide for Regional Application*.

3. Review of the Michigan State Board of Education's Adopted Affirmative Action Plan.

4. Completion of Policy and Program Analysis Checklists by OCTE program staff.

Note: The 1989 *Administrative Guide for Vocational-Technical Education in Michigan* was not updated. However, the State program components were used as written.

D. Results of Review

1. The Department's policies that govern all four areas of review are in compliance with the *Guidelines*. In reference to 45 CFR, Part 80, Appendix B of the *Guidelines*:

   a. The Department's policies adhere to Sections III and IV for the establishment of criteria or formulas for distribution of Federal or State funds to vocational education programs.

   b. The Department's policies adhere to Sections IV, V, VI, VII, and VIII for the establishments of requirements for the administration of vocational education programs.

   c. The Department's policies adhere to section VII for the approval of action by local entities providing vocational education.

   d. The Department's policies adhere to Sections III, IV, V VI, VII, and VIII for the conduct of its own programs.

2. There were no new policies to be reviewed.

3. There was no need for amendments or recisions of any policies.

III. REVIEW OF STATE-OPERATED INSTITUTIONS AND PROGRAMS

STIRC is the only state-operated institution eligible for review. STIRC is operated by the Michigan Rehabilitation Services, Department of Education. STIRC provides vocational training and comprehensive rehabilitation services necessary to equip citizens with disabilities for employment and self-sufficiency.

During the 1993-94 desk audit process, STIRC was not selected for desk audit review because its has been placed with the West region to be audited in the last year of the cycle, 1994-95.

IV. SUBRECIPIENTS RECEIVING AGENCY DESK AUDITS

A. Methodology - Selection Process

As directed by the U.S. Department of Education, the definition of a subrecipient changed last year. In the past, the definition of a subrecipient was based upon funding of approved vocational programs as well as federal financial assistance. As directed by the Department of Education's Office for Civil Rights, the funding factor was removed.

With removal of the funding factor from the definition of a subrecipient, the number of subrecipients in the total pool greatly increased, from 318 to 410. This necessitated the need to develop a more economical method of selection for the desk audit and ultimately the on-site review. Previously, subrecipients were entered into the desk audit pool by random selection. This was changed to a regional selection process.

The basis of regionalization was described in the previous annual report. Exceptions to regional selection would always involve those fiscal agencies which meet the criteria for priority selection.

Assignment of Regions

Existing CEPDs (Career Education Planning Districts) were used as a basis for regionalization. The criteria for the division of CEPDs into regions included both the number of secondary fiscal agencies and the number of operating facilities (buildings) within a secondary fiscal agency. The total number of fiscal agencies for any one region had to be 20% of the total agencies as defined by the *Methods of Administration*. To approximate a balance of agencies among regions, community colleges were assigned last to regions based on proximity.

Table 1 displays the regional distribution of subrecipients (secondary agencies and community colleges) and the number of facilities represented by the secondary subrecipients. The total number of subrecipients represented by each region approximates at least 20%. This 20% limitation superseded the need for CEPDs of a region to be contiguous.

Table 1

Subrecipient Distribution Among Regions

Region	Secondary Subrecipients		Community Colleges	Total Subrecipients
	Fiscal Agents	Facilities		
North	74	113	8	82
Central	77	128	5	82
Thumb	75	118	7	82
South	75	121	7	82
West	76*	112	6	82
Totals	377	592	33	410

* Includes one State-Operated Facility

Implementation of Regionalization

Two major factors were considered important to implementing a regional selection process in the middle of a five-year cycle. First, the number of agencies audited in each region during the first two years of this cycle had to be considered (see Table 2). Since regions would have to be combined, the total number of agencies to audit still had to approximate 20%. Second, the order to be followed in selecting regions for subsequent five-year cycles was considered to maximize the number of years between audits. Based on these criteria, the combination of regions to be audited in the remainder of the third five-year cycle were chosen to be North and Central in 1992, Thumb and South in 1993, and West in 1994. The order for the next five-year cycle will begin with the North region then continue with the Central, Thumb, South and West. Each subsequent cycle would follow the same order.

Exceptions to regional selection would always involve those fiscal agencies which meet the criteria for priority selection.

Table 2

Agencies Audited in the First Two Years of the Third Cycle

Region	Audited '90 -'91		Audited '91 -'92		TOTAL Audited '90 -'92
	Secondary Agencies	Community Colleges	Secondary Agencies	Community Colleges	
North	25	2	12	1	41
Central	17	1	15	1	34
Thumb	24	1	13	2	40
South	0	3	21	0	24
West	11	0	16	2	29
Totals:	78	8	77	6	168

Appendix A provides a list of the *Total Pool of Subrecipients*. This includes all 376 K-12 fiscal agencies, 33 community colleges and 1 state-operated institution. Hence, a total pool of 410 subrecipients.

After subtracting subrecipients that met the following exclusion criteria (274), the total number of subrecipients remaining to be desk audited was **136**:

- Those previously reviewed by the Michigan Department of Education, if any, for civil rights compliance in vocational education within the established five-year cycle.

- Those that are the subject of pending litigation in Federal or State courts because of alleged discrimination on the basis of racial/ethnic, gender identity or disability.

- Those that are the subject of pending conciliation involving legal review or public hearing as identified by the Office for Civil Rights, or those involved in recent investigations or enforcement proceedings by the Office for Civil Rights within the past five years.

No exclusions resulted from the last two criteria due to the lack of data from the Federal office.

In order to select 20 percent of the total pool of subrecipients for the desk audits, the following measures were taken:

1. Fiscal agencies and community colleges from any region that were the subject of complaints were added to the desk audit list as priority selections.

2. Fiscal agencies and community colleges not previously audited from the Thumb and South regions were added to the list to approximate a 20 percent quota.

In this second transitional year of regionalization, 21 percent (85) of the total number of subrecipients were audited for the 1993-94 fiscal year. Hence, the desk audits for the fourth year of the third five-year cycle consisted of: 79 K-12 fiscal agencies, 6 community colleges and 0 state-operated institutions.

Appendix B includes a list of the agencies desk audited. Appendix C provides a copy of the letter mailed to desk audit recipients.

B. Total Agency-Level Desk Audits for the Third, Five-Year Cycle

We have completed 345 agency-level desk audits during the third, five-year cycle (1990--(92), 1991--(90), 1992--78, 1993--85). This number includes 318 K-12 agencies and 27 community colleges. MDE has exceeded the number of required desk audits for the fourth, five-year cycle by 4 percent (345 desk audits versus 328 required).

C. Desk Audit Procedures

1. Data Analyzed

Data that enumerate and describe vocational education programs which are currently required by and submitted to MDE were examined. This type of audit was designed to identify situations of possible noncompliance such as imbalanced representation of racial/ethnic groups, females/males, and students with disabilities enrolled in vocational education programs. The process provided a basis for selecting agencies for on-site reviews to determine if the desk audit findings were the result of discriminatory policies or practices.

The following reports for fiscal year 1992-93 were reviewed to monitor compliance with Title VI, Title IX and Section 504:

a. HE-4665 - Academic Year Vocational Education Report

b. Integrated Postsecondary Education Data System (IPEDS)

c. TE-4142 - Register of Professional Personnel

d. VE-4166-D - Postsecondary Final Report Enrollment

e. VE-4301 (VEDS) - Annual Report on Enrollment and Completion in Vocational Education Programs

f. VE-4483 Data - Program/Course/Section Data Verification and Enrollment Report

g. VE-4483-A - Vocational Teacher Fall Report Packet

2. "Worst-First" or Priority Selection

Efforts were made to identify the following types of districts:

a. Districts where litigation or conciliation involving legal review or public hearing was pending.

b. Districts which were subjects of complaints for possible discrimination.

c. Districts under court order.

3. Exclusion Criteria for Exemption Status

Secondary, postsecondary institutions, and state-operated institutions to which the following criteria applied were eligible for exclusion from review:

a. Those that were the subjects of pending litigation or under judicial order in Federal or State courts because of alleged discrimination in or related to, vocational education on the basis of racial/ethnic, gender identity, and disability.

b. Those that were the subject of pending conciliation involving legal review or public hearing as identified by OCR, or those involved in recent investigations or enforcement proceedings by OCR within the past five years.

Districts for priority selection or exemption status were identified by information obtained from the Attorney General of Michigan; United States Department of Education, Office for Civil Rights--Region V, and MDE/Office of School and Community Affairs.

The following information was received as a result of the requests:

a. The Attorney General of Michigan responded that the Attorney General's Office staff was not aware of any public K-12 school districts, ISDs, area centers/consortia, postsecondary educational institutions, or state-operated institutions that were the subjects of pending litigation in federal or state courts, or subjects of complaints.

b. The U.S. Department of Education/handling Region V OCR office submitted a list of Michigan educational agencies that had been the objects of complaints filed with OCR for the year of 1991 or the subject of investigation or pending conciliation. This aided in the worst-first selections and the determination of the basis for exemption status.

c. The MDE/Office of School and Community Affairs staff responded that their office had not received notification of any public K-12 school districts, ISDs, area centers/consortia, postsecondary educational institutions, or state-operated institutions that were subjects of pending litigation in Federal or State courts, or subjects of complaints.

D. Benchmarks

Benchmarks have been established to compare data pertaining to special populations or protected groups as specified in *Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex and Disability*, and are analyzed by the MDE personnel:

1. To identify situations of possible noncompliance indicated by unbalanced representation in vocational education programs.

2. As the basis for selecting sites for further inquiry to determine the accuracy of the agency desk audit.

The following benchmarks were used for the desk audit:

a-1. The percentage of secondary vocational education enrollees by racial/ethnic category compared to the percentage of students in each racial/ethnic category in the total 9-12 population serviced by the subrecipient.
Data source: VE-4301 and Racial Ethnic Census

a-2. The percentage of secondary vocational education enrollees by racial/ethnic category compared to the percentage of secondary vocational education completers in each racial/ethnic category.
Data source: VE-4301

b-1. The percentage of postsecondary occupational program enrollees by racial/ethnic category compared to the percentage of students in each racial/ethnic category in the postsecondary institution.
Data source: HE-4665 and IPEDS Report

b-2. The percentage of postsecondary occupational program enrollees by racial/ethnic category compared to the percentage of postsecondary occupational program completers in each racial/ethnic category.
Data source: HE-4665 and VE-4166-D

c-1. The female/male distribution of secondary vocational education enrollees compared to an assumed 50/50 female/male distribution in the subrecipient's total 9-12 enrollment population.
Data source: VE-4301 and an assumed 50/50 distribution

c-2. The female/male distribution of postsecondary occupational education enrollees compared to the female/male distribution of the total occupational education enrollees.
Data source: VE-4301

d-1. The female/male distribution of postsecondary occupational program enrollees compared to the female/male distribution of the total enrollment at the postseondary institution.
Data source: VE-4665

d-2. The female/male distribution of postsecondary occupational program completers compared to the female/male distribution of postsecondary occupational program enrollees.
Data source: HE-4665

f. The percentage of postsecondary occupational program enrollees with disabilities compared to the perecentage number of the total postsecondary enrollment population with disabilities.
Data source: HE-4665

j-1. The percentage of secondary vocational education teachers categorized by racial/ethnic categories compared to the racial/ethnic distribution of the vocational education student population in the service area.
Data source: VE-4483 and TE-4142

j-2. The percentage of secondary vocational education teachers categorized by gender compared to the gender distribution of the vocational education student population in the service area.
Data source: VE-4483 and TE-4142

E. Analysis of Data (Secondary)

For the purpose of data analysis, benchmarks were grouped into three separate categories representing race/ethnic; gender; and disability data. Benchmarks applicable to K-12 fiscal agencies were a-1, a-2 and g-1 categorized under race/ethnicity, and c-1, c-2 and g-2 categorized under gender. Only wage-earning programs were reviewed for benchmarks requiring data for "completers" (as defined by the Vocational Education Data System).

For each benchmark, the average percentage difference between factors being compared was computed to determine a preliminary score. The preliminary scores were ranked from low to high (the lowest percentage receiving a rank of 1). The ranks for the three benchmarks representing racial/ethnic categories and the three benchmarks representing gender were summed. These sums represented the magnitude of the differences for the racial/ethnic and gender categories. These sums were then ranked from highest to lowest to use in the selection of participants for on-site review. Twenty-three (23) of the K-12 fiscal agencies with the highest sums were reviewed on-site to determine the accuracy of the agency desk audit findings resulting in a potential "worst first" selection. (See Appendix G for forms used to collect data on-site).

F. Analysis of Data (Postsecondary)

For the purpose of data analysis, benchmarks were grouped into three separate categories representing race/ethnic; gender; and disability, disadvantaged and limited English proficient data. Benchmarks applicable to postsecondary institutions were b-1 and b-2 categorized under race/ethnicity; d-1 and d-2 categorized under gender; f, i and k categorized under disability, disadvantaged and limited English proficiency.

For each benchmark, the absolute value of the percent differences are summed. The sums for the three benchmarks representing racial/ehtnic categories, the three benchmarks representing gender, and the single benchmark for disability (carried over) were summed to provide three categorical scores. These sums represented the magnitude of differences for the racial/ethnic, gender, and disability categories. Categorical scores were then summed to provide a composite rating. The composite ratings were then ranked from highest to lowest to use in the selection of participants for on-site review resulting in an implied "worst first" selection. (See Appendix G for forms used to collect data on-site). The 14 The two community colleges with the highest single composite scores were reviewed on-site to determine the accuracy of the agency desk audit findings.

G. Results of the Agency Desk Audits

Reports summarizing the findings of the agency desk audits were sent to all participants. Included in the participant's reports were tables illustrating the subrecipients' data for each applicable benchmark. Tables for benchmarks a-1 and c-1 were presented in sets of two in order to illustrate the separate treatment of consumer home economics program data. Complete desk audit reports have been filed and are available for review.

Cover letters that accompanied the desk audit reports offered technical assistance. The assistance was offered from both the MDE OCR Consultant and IDEA's staff. (See Appendices D and E.)

Clear and present violations were not found as a result of the desk audit reviews; therefore, no corrective actions were necessary at this level of the review process.

V. IDENTIFICATION OF SUBRECIPIENTS FOR ON-SITE REVIEWS

A. Methodology - Selection Process

There were no changes in the method of selecting the subrecipients for on-site reviews. Compiled results of the 1993-94 agency desk audits were used to select participants for on-site reviews. The *Methods of Administration* require that 25 percent of the subrecipients desk audited annually be reviewed on-site. Eighty-five (85) agencies were desk audited, hence 21 agencies were required to be reviewed.

Twenty three (23) agencies, representing 27 percent of those desk audited, were selected for on-site reviews, exceeding the minimum of 25 percent required. The chosen participants included 20 percent of the agencies receiving the highest composite scores and five percent of those who had never been previously reviewed. The 23 agencies selected included 18 K-12 fiscal agencies and 2 community colleges. MDE continued to meet the required number of on-site reviews for the fourth year of the third, five-year cycle.

Selected agencies were notified in the cover letter that accompanied the desk audit findings. The dates of the pending on-site reviews were included in a follow-up letter distributed at the inservice. Appendix F includes a list of the selected agencies--including review dates.

B. Previsit Activities

Prior to each visit, the "on-site coordinator", a person designated by each participant to coordinate activities for the review, received an *On-Site Review Coordinator's Manual* which explains the preparations to be made regarding types of materials, data and scheduling needed for the review (See Appendix G).

IDEA staff distribute these manuals as part of the ***OCR Technical Assistance Guide*** at the two inservices provided to explain the OCR program including the desk audits, the on-site review process, the compliance plan, and the availability of technical assistance. Contact persons that do not attend an inservice are mailed the ***OCR Technical Assistance Guide*** which includes the ***On-Site Review Coordinator's Manual***.

A staff workshop (inservice) was given to both OCTE staff and IDEA staff to review the on-site review procedures.

C. On-Site Activities

On-site reviews were scheduled between September and December of 1993. Teams of three monitors, including members of IDEA and the OCTE staff, reviewed participants on-site. Review activities consisted of staff and student interviews, a tour of the facilities, and a document review. Each on-site review lasted for one or two days based on the size of the local agency and complexity of the review.

D. Report of On-Site Reviews

Final reports of the on-site reviews, specifying items of noncompliance and recommendations, were submitted to the chief administrative officer and designees of all participating agencies.

Findings of the on-site reviews were presented in three parts. Procedural requirements of the supplementing regulations, such as assurances, adoption of policies of nondiscrimination, dissemination of policies of nondiscrimination, designation of specific employee, adoption and publication of grievance procedures, etc., were addressed in the first part. The second and third parts addressed the requirements of the Civil Rights *Guidelines* and findings of the agency desk audit, respectively.

Each *On-Site Review Report* summarized the findings of the review and the recommendations for compliance, if necessary. Directions for compliance accompanied each report. In all cases, the chief administrative officers and designees were given at least ten days to review the reports, after which follow-up calls were made by a member of the monitoring team to discuss the findings of the reports and to acquaint district personnel with the IDEA staff person who assisted in developing and monitoring the voluntary compliance plans.

Cover letters offered technical assistance in the development and implementation of voluntary compliance plans, if plans were needed Appendix H includes the cover letters and *On-Site Review Reports* for all agencies reviewed. The dates of notification are synonymous with the cover letter dates.

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E. Submission and Monitoring of Compliance Plans

The timeframes for submittal of voluntary compliance plans were given at the regional inservices for the agencies selected to be visited. The timeframes were reiterated at the exit interviews of the on-site reviews. An IDEA staff member was designated as compliance plan monitor for each participating K-12 agency, community college, and the state-operated institution.

Following the issuance of the On-Site Review Reports, subrecipients were given a maximum of 120 days to submit voluntary compliance plans to MDE. Local agencies were instructed to send first drafts of the compliance plans to IDEA for review and for tentative approval by OCTE. An IDEA staff member was designated as compliance plan monitor for each participating K-12 agency, community college and the state-operated institution.

Each plan was reviewed by IDEA staff to determine whether it was acceptable as presented or required modification based on procedures outlined in "Directions for Developing A Voluntary Compliance Plan."

Following the reviews and upon recommendation of the IDEA compliance plan monitor, letters of tentative approval were issued by MDE (See Appendix I). Included in the letters were the concerns, recommendations and timelines pertinent to final approval of the plans. A form for local board certification was also attached to each tentative approval letter.

After board certification was received and final approval was issued, the compliance plans were reviewed again by the monitor to identify technical assistance needs and to determine probable dates for checking with the agencies to document the implementation of compliance activities (See Appendix J). Letters acknowledging the receipt and adequacy of items reviewed were sent to all participants (See Appendix K). If needed, letters which requested overdue documentation were sent to ensure timely submission of documents (See Appendix L).

Between the dates of April 1, 1993 and March 31, 1994, tentative approval was issued for 20 compliance plans (19 for 1993-94, 1 for 1992-93); final approval for 9 compliance plans (2 for 1993-94, 7 for 1992-93); final closure for 13 compliance plans (1 for 1992-93, 11 for 1991-92, 1 for 1989-90); and 2 agencies were not required to submit a compliance plan for 1993-94. (These two fiscal agencies either did not have any findings, or cleared up minor findings prior to the deadline for compliance plan submission; and, therefore, negated the need for submittal of compliance plans).

Final approval of compliance plans for the third, five-year cycle has been issued for all participants of 1990-91, 1991-92, 1992-93, and for two participant of 1993-94.

Compliance plan status for the third, five-year cycle:

1. 63 Closures
2. 41 Open Plans
3. 30 Agencies for Which No Plans Were Required
4. 1 Agency for Which No Plan Was Submitted

Letters documenting complete implementation of the voluntary compliance plans have been issued for all districts that have complied (See Appendix M). The status, through March 31, 1994, of compliance plans for districts that are still being monitored to closure have been given in the OCR Quarterly Reports (See Appendix N). Copies of compliance plans for the 1993-94 fiscal year have been mailed under separate cover. Also being mailed under separate cover is a quarterly report which reflects status of compliance plan closures for the period of April 1, 1994 through June 30, 1994.

Following is a listing of agencies reviewed for 1993-94, 1992-93, 1991-92 and those with compliance plans that had previously not been closed for 1989-90 and 1988-89. The dates for tentative compliance plan approval, final compliance plan approval, and compliance plan closure have been included.

STATUS OF 1993-94 AGENCIES

Agencies Reviewed 1993-94	Tentative Compliance Plan Approval	Final Compliance Plan Approval	Compliance Plan Closure
1. Akron-Fairgrove Schools	01/18/94	03/31/94	
2. Allen Park Public Schools	03/28/94		
3. Camden-Frontier Schools	03/16/94		
4. Capac Community Schools	Completed Within 30 Days No Compliance Plan Required		
5. Columbia School District	03/18/94		
6. Ecorse Public Schools			
7. Flat Rock Community Schools	03/22/94		
8. Hamtramck Public Schools	02/22/94		
9. Jonesville Community Schools	02/03/94		
10. Laingsburg Community Schools	02/22/94	03/31/94	
11. Morrice Area Schools	03/17/94		
12. Northville Public Schools	02/22/94		
13. Onsted Community Schools	01/21/94		
14. Ovid-Elsie Area Schools	03/04/94		
15. Sand Creek Community College	02/03/94		
16. Schoolcraft College	Completed Within 30 Days No Compliance Plan Required		
17. St. Clair Intermediate School District	03/18/94		
18. St. Johns Public Schools	03/22/94		
19. Unionville-Sebewaing Schools	03/18/94		
20. Waldron Area Schools	03/16/94		
21. Wayne County Community College	03/17/94		
22. Wayne-Westland Community Schools			
23. Westwood Community Schools	03/28/94		

STATUS OF 1992-93 AGENCIES

Agencies Reviewed 1993-94	Tentative Compliance Plan Approval	Final Compliance Plan Approval	Compliance Plan Closure
1. Bullock Creek School District	03/05/93	03/23/93	
2. Calumet Public Schools	01/27/93	02/22/93	
3. Chippewa Hills Public Schools	01/13/93	02/08/93	
4. Clintondale Community Schools	02/04/93	07/19/93	
5. Copper Country ISD	01/19/93	08/09/93	
6. East Detroit Public Schools	01/18/93	03/12/93	
7. Ferndale School District	02/08/93	06/18/93	
8. Gogebic-Ontonagon ISD	02/17/93	03/03/93	
9. Grant Public Schools	02/12/93	02/24/93	
10. Huron Valley Schools	03/29/93	04/03/93	
11. Iosco ISD	02/12/930	03/16/93	
12. Kalkaska Public Schools	Excused from Review Due to School Closing		
13. Mason County Central Schools	01/08/93	02/03/93	
14. Midland Public Schools	01/14/93	06/18/93	
15. Montcalm Community College	Completed Within 30 Days No Compliance Plan Required		
16. Oakland ISD	04/08/93	08/25/93	
17. Oxford Community Schools	Completed Within 30 Days No Compliance Plan Required		
18. Royal Oak Public Schools	01/22/93	04/29/93	
19. Rudyard Area Schools	02/23/93	03/01/93	
20. St. Clair Co. Community College	02/08/93	02/26/93	

STATUS OF 1991-92 AGENCIES

Agencies Reviewed 1992-93	Tentative Compliance Plan Approval	Final Compliance Plan Approval	Compliance Plan Closure
1. Anchor Bay Public Schools	02/11092	05/22/92	02/26/92
2. Bay de Noc Community College	02/11/92	04/22/92	03/07/94
3. Birmingham Public Schools	05/23/92	05/15/92	12/17/93
4. Brighton Area School	03/23/92	07/27/92	01/07/94
5. Charlotte Public Schools	01/31/92	05/04/92	
6. Cheboygan Area Schools	01/27/92	05/04/92	02/21/94
7. Clarkston Community Schools	01/15/92	08/13/92	
8. Durand Area Schools	02/11/92	07/20/92	03/04/94
9. Farmington Public Schools	Completed Within 30 No Compliance Plan Required		
10. Garden City Public Schools	01/22/92	09/06/92	01/27/93
11. Grand Rapids Community College	03/23/92	08/17/92	01/07/94
12. Howell Public Schools	03/23/92	08/25/92	12/13/93
13. Ionia County Area Vocational Consortium	01/27/92	07/20/92	12/17/93
14. Kentwood Public Schools	05/13/920	07/13/92	02/12/93
15. Lake Michigan Community College	02/11/92	04/22/92	02/11/94
16. Lansing School District Area Center	01/22/92	05/14/92	07/27/92
17. Lincoln Park Public Schools	No Compliance Plan Required		
18. Mount Clemens Community Schools	06/17/92	07/20/92	08/26/93
19. Oak Park Public Schools	02/03/92	05/04/92	
20. Petoskey Public Schools Area Center	03/23/92	09/06/92	03/16/93
21. Pontiac School District	06/17/92	09/16/92	
22. Ravenna Public Schools	Closed Within 60 Days No Compliance Plan Required		
23. Southgate Community Schools	02/26/92	04/22/92	02/12/93
24. Sturgis Public Schools	01/27/92	03/09/92	09/14/92
25. Utica Community Schools	03/23/92	05/20/92	03/08/94
26. Waterford School District	03/23/92	08/26/92	01/18/93
27. Wyandotte Public Schools	03/23/92	04/22/92	03/28/94

STATUS OF 1989-90 AGENCIES

Agencies Reviewed 1989-90	Tentative Compliance Plan Approval	Final Compliance Plan Approval	Compliance Plan Closure
1. South and West Washtenaw Area VocationalConsortium	04/06/90	08/09/90	2/11/94
2. South and West Washtenaw Area Vocational Consortium Revisited	04/13/92	05/19/92	2/11/94

STATUS OF 1988-89 AGENCIES

Agencies Reviewed 1988-89	Tentative Compliance Plan Approval	Final Compliance Plan Approval	Compliance Plan Closure
1. State Technical Institute and Rehabilitation Center	05/25/89	08/18/89	

The State Civil Service Application form which needed to be revised before STIRC's compliance plan could be closed is currently being revised and is expected out sometime this summer.

VI. TECHNICAL ASSISTANCE ACTIVITIES

The Special Populations Programs and Services Unit of OCTE, with assistance from IDEA, is primarily responsible for the development and coordination of technical assistance for Civil Rights Compliance in vocational education. In preparation for this monitoring program, the total staff of OCTE and field personnel have been inserviced to familiarize them with pertinent concepts and components. Special inservice sessions conducted annually by IDEA staff are designed to assist with specific program activities, such as analyzing data, reviewing documents and materials, conducting interviews, and reporting findings.

Two inservice sessions were conducted by the OCTE and IDEA staffs for educational agency personnel. Each district that was reviewed on-site was assigned an individual from IDEA to facilitate technical assistance in the development and implementation of compliance plan activities. Additional technical assistance was provided in the forms of telephone calls, items of correspondence, and meetings. Logs of all technical assistance activities from July 1, 1992 to June 30, 1993 are being mailed under separate cover.

The *Technical Assistance Guide* was updated and subsequently disseminated at the regional inservices to assist K-12 agency and community college personnel in assessing compliance needs, modifying policies and practices, and planning for remediation.

The technical assistance materials for recruitment and retention of minority staff and students developed by CRW Associates continue to be available at the Michigan Vocational Education Resource Center at Michigan State University.

Since the fall of 1984, additional technical assistance has been provided to all agencies that did not complete a Title IX Self-Evaluation in the required timeline. An agreement with the Office for Sex Equity provides for offering technical assistance to agencies wishing to complete a Title IX Self-Evaluation.

A continuing grant was let to IDEA Consultants, Incorporated during 1993-94 to assist in all aspects of the OCR activities. Appendix O provides a copy of IDEA's Negotiated Grant Agreement.

Following is a listing of the major technical assistance activities provided by IDEA and the audiences to which the activities were delivered.

TECHNICAL ASSISTANCE ACTIVITIES

ACTIVITY	LOCATION/TARGET AUDIENCE	DATE
Regional OCR Inservice	Lapeer - Personnel of agencies desk audited	04/27/93
Regional OCR Inservice	Lansing - Personnel of agencies desk audited	05/06/93
OCR Staff Inservice	Lansing - OCTE and IDEA staffs	09/07/93
In-House Visits*	Oakland ISD	05/05/93
	Utica Community Sch	06/25/93
	Allen Park Public Schools	08/16/93
	Oak Park Public Schools	10/19/93
	Oak Park Public Schools	11/03/93
	Pontiac School District	01/24/94
	St. Clair ISD	02/10/94
	Clintondale Comm Sch	03/25/94
On-Site Visits	St. Clair ISD	02/18/94

* Visits for compliance plan technical assistance.

VII. SUBRECIPIENTS REFERRED TO THE OFFICE FOR CIVIL RIGHTS

There were no subrecipients unwilling to negotiate voluntary compliance plans. Likewise, there were no subrecipients referred to OCR for failure to negotiate or implement a voluntary compliance plan.

VIII. MONITORING ACTIVITIES

The OCR Consultant was and continues to be responsible for monitoring all of the OCR activities which includes monitoring the activities provided by IDEA, the timely completion of all on-site reviews, compliance plan submittals, and compliance plan closures. IDEA submits monthly status reports to OCTE.